

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

KAYLA REED, an individual,

Plaintiff,

Civil Action No. 17-00506

v.

Honorable Judge Timothy S. Black

SUNGLASS HUT TRADING, LLC,

Defendant.

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND DEFENDANT’S TIME TO
RESPOND TO PLAINTIFF’S COMPLAINT AND SUPPORTING MEMORANDUM**

Pursuant to Local Rule 7.3, Defendant Sunglass Hut Trading, LLC (“Defendant” or “Sunglass Hut”), with the consent of Plaintiff Kayla Reed (“Plaintiff”) (together the “Parties”) respectfully requests that the Court approve Defendant’s Unopposed Motion to Extend Defendant’s Time to Respond to Plaintiff’s Complaint. Prior to submitting this Motion Defendant conferred with Plaintiff and provided her with a copy of the Motion. Plaintiff does not oppose this Motion. In support of its Motion, Sunglass Hut avers as follows:

Plaintiff filed her Complaint on July 31, 2017. The Parties stipulated, and the Court granted, Sunglass Hut until September 8, 2017 to file a response to the Complaint. Sunglass Hut requires additional time to complete its investigation into the allegations of the Complaint and to provide an appropriate response. Beth Joseph, Counsel for Sunglass Hut, is located in Miami, Florida and is currently preparing for Hurricane Irma. Ms. Joseph’s investigation into Plaintiff’s allegations have been delayed due to the safety concerns posed by Hurricane Irma. Furthermore, the Parties require additional time to continue ongoing settlement discussions.

The Parties have mutually agreed to an extension of twenty-one days (21) for Sunglass Hut to move, answer, or otherwise respond to Plaintiff’s Complaint. The new deadline for

Sunglass Hut to move, answer, or otherwise respond to the Complaint would be September 29, 2017.

WHEREFORE, Sunglass Hut respectfully requests that the Court grant its Motion and extend Sunglass Hut's time to move, answer, or otherwise respond to the Complaint to September 29, 2017.

Dated: September 6, 2017

Respectfully submitted,

s/ Andrew Barber

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Trial Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 6, 2017, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission or Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Andrew Barber

Andrew Barber

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